

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA,)	
)	CASE NO.: <u>1:19-cr-132</u>
Plaintiff,)	
)	JUDGE SARA LIOI
v.)	
)	MOTION FOR LEAVE
HARGIS HALL)	
)	
)	
Defendant.)	

Comes now the Defendant, by and through counsel, and moves this court for an Order granting Defense Counsel 45 days leave to file a supplemental motion for compassionate release.

After further investigation, another factor has been discovered that is relevant to the issues in this case. Because of defendant's smoking, the defendant is more susceptible to Covid-19.

Therefore, the defendant, by and through counsel, moves this Court for an Order granting additional time to present this factor to the Warden

Because this factor is new and has not yet been provided to the Warden as a factor to be considered, a 45 day continuance is requested. This will give the Warden time to review and also consider the requests.

Defense Counsel spoke with the AUSA and the Government has no objection to this motion.

Respectfully submitted,

/s/Joseph W. Gardner

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CERTIFICATION

I hereby certify that on October 15, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular US mail. Parties may access this filing through the Court's system.

/s/Joseph W. Gardner

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